



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue  
Seattle, WA 98101-3140

OFFICE OF  
ENVIRONMENTAL REVIEW  
AND ASSESSMENT

January 13, 2017

Jennifer Zbyszewski, Program Manager  
Methow Valley Ranger District  
24 West Chewuch Road  
Winthrop, Washington 98862

Dear Ms. Zbyszewski:

The US Environmental Protection Agency has reviewed the U.S. Forest Service's October 2016 Pack and Saddle Stock Outfitter-Guide Special Use Permit Issuance Draft Supplemental Environmental Impact Statement (DSEIS) (EPA Region 10 Project Number: 05-034-AFS).

We conducted our review according to EPA's responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Our review of the DSEIS considers the expected environmental impacts of the proposed action and whether the EIS meets the procedural and public disclosure purposes of NEPA. We have assigned a LO (Lack of Objections) rating to the Pack and Saddle Stock Outfitter-Guide Special Use Permit Issuance DSEIS. A copy of the EPA rating system is enclosed.

The DSEIS incorporates new information based on a revised Needs Assessment and extent necessary determination for commercial services in the Pasayten and Lake Chelan-Sawtooth Wilderness and information about other changed conditions. We have no comments about this new information.

The EPA's November 2010 and April 2013 comments on the Draft and Final EISs for this project expressed our support for this project's proposed mitigation measures. We encouraged the Forest Service's intention to adopt the Final EIS's mitigation measures as standard practice for pack and saddle stock outfitter-guides.

Now, we reiterate our support for the mitigation measures disclosed in the 2013 Final EIS, as well as the one updated measure in the DSEIS. This project's mitigation measures are of central importance in terms of reducing the negative effects in the project area because, for example, they serve as Best Management Practices to protect water quality.

In addition, we note the importance and our support for monitoring described in the 2013 Final EIS. In the interest of iterative improvement, we offer the following suggestions to clarify monitoring information in the Final Supplemental EIS (FSEIS).

- Discuss or define what the Forest Service means by "...representative sample of outfitter-guide camps and operations..."<sup>1</sup> to be checked seasonally. Is there, for example, a minimum number of

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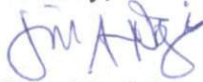
<sup>1</sup> 2013 Final EIS, p. 2-26

field inspection reports that the Forest Service believes would be necessary to determine compliance?

- Discuss or define what the Forest Service means by "If unacceptable changes are noted, pack and saddle stock outfitter-guides may be restricted from using the impacted camps until the sites recover."<sup>2</sup> Consider, as appropriate, describing thresholds for what would be "unacceptable change" for indicators such as: stream bank disturbance, streamside vegetation disturbance at access points, areas of barren ground, evidence of contaminants in water, trailing in wetlands, trees with exposed roots. We recommend describing thresholds as best as possible as a means of facilitating effective communication among outfitters and between outfitters and the Forest Service.

Thank you for this opportunity to comment. If you have any questions please contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov), or, myself at 206-553-1841 or by electronic mail at [nogi.jill@epa.gov](mailto:nogi.jill@epa.gov)

Sincerely,



Jill A. Nogi, Manager

Environmental Review and Sediment Management Unit

Enclosure:

1. US Environmental Protection Agency Rating System for Draft Environmental Impact Statements

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<sup>2</sup> 2013 Final EIS, p. 2-28

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.